

EXHIBIT 15

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June 27, 2017

VIA ELECTRONIC MAIL ONLY

Alison Hurley
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Tiffany Bacon
Bremer Whyte Brown & O'Meara, LLP
20320 S.W. Birch Street 2nd Floor
Newport Beach, CA 92660
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Re: *Cory Spencer, et al. v. Lunada Bay Boys, et al.*

Dear Ms. Hurley and Ms. Bacon:

On November 16, 2016, Plaintiffs propounded requests for production of documents on Defendants Charlie and Frank Ferrara. Among other items, the requests sought copies of these defendants' cell phone bills and relevant text messages. (See Request Nos. 5 (text messages with surfers who regularly surf Lunada Bay), 7 (text messages or records of phone calls with a co-defendant), 40 (cell phone bills since January 1, 2013), attached.) Both defendants responded that they did not possess any responsive documents to any document request. And to date, neither defendant has produced any documents in this case.

Beginning in January 2017, I met and conferred with your predecessor, Laura Bell, several times to discuss this issue. Specifically, I requested that your clients produce their phone records (including call logs) and text messages. Although both Charlie and Frank Ferrara's discovery responses stated that they did not possess any responsive documents, a review of co-Defendant Sang Lee's privilege log indicates that he regularly communicated with Charlie and Frank Ferrara. (See, e.g., December 29, 2016 Sang Lee Privilege Log, at Lee 0000105, Lee 0000106, Lee 0000108, Lee 0000109, referencing incoming and outgoing text messages between Sang Lee, Charlie Ferrara, and "Franky Ferrara," among others.) No objections on the basis of privilege were asserted by either Defendant in their discovery responses. Accordingly, there is no basis for Defendants' withholding of relevant and responsive documents.

In accordance with Civil Local Rule 37-1, Plaintiffs are requesting that you make yourselves available for a telephonic meet and confer to discuss this matter further. I am available the following dates and times, please let me know at your earliest convenience which works best for you:

- Wednesday, June 28th from 9-12 and 1-4
- Thursday, June 29th – all day
- Friday, June 30th – all day
- Monday, July 3rd – all day
- Wednesday, July 5th from 9-12

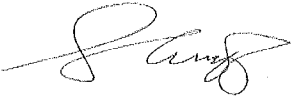
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Tiffany Bacon
Alison Hurley
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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Wolff', written in a cursive style.

Samantha Wolff

Attachments

cc: Co-counsel